

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re Application of

THE TRUSTEES OF THE WEMYSS
HEIRLOOMS TRUST,

Applicant

Pursuant to 28 U.S.C. § 1782 for Judicial
Assistance in Obtaining Evidence for
Use in a Foreign Proceeding

No. _____

**APPLICATION OF THE TRUSTEES OF
THE WEMYSS HEIRLOOMS TRUST
PURSUANT TO 28 U.S.C. § 1782**

PLEASE TAKE NOTICE that on a date to be determined by the Court, the Trustees of the Wemyss Heirlooms Trust (“The Trustees”), by their attorneys Lowenstein Sandler LLP, will move for an order, pursuant to 28 U.S.C. § 1782, granting the Trustees’ application seeking discovery from Michel David-Weill, Adam Williams Fine Art Ltd. and Adam Williams for use in a proceeding to be commenced in the High Court of Justice, Queen’s Bench Division, Commercial Court or such other venue in England and Wales as the Trustees may deem appropriate.

In support hereof, and filed contemporaneously herewith, the Trustees submit:

- (1) A Memorandum of Law in Support;
- (2) The Declaration of Jennifer Fiorica Delgado (and exhibits thereto);
- (3) The Declaration of Davina Given; and
- (4) A Proposed Order.

Dated: November 19, 2019

Respectfully submitted,

By: /s/ Jennifer Fiorica Delgado
Jennifer Fiorica Delgado
LOWENSTEIN SANDLER LLP
1251 Avenue of the Americas
New York, New York 10020
Tel.: (212) 262-6700
jdelgado@lowenstein.com
*Attorneys for Applicant The Trustees of
the Wemyss Heirlooms Trust*